

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

FEB 9 4 24 PM '98

OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**THE DIRECT MARKETING ASSOCIATION, INC.'S FOLLOW-UP  
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO UPS WITNESS SELICK (DMA/UPS-T2-6)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice and Special Rule of Practice 2.D., the Direct Marketing Association, Inc. ("DMA") hereby submits the attached follow-up interrogatory and request for production of documents to UPS witness Sellick (DMA/UPS-T2-6). This interrogatory is a follow-up to an interrogatory response received by the DMA on February 3, 1998. If the designated witness is unable to respond to this interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Dana T. Ackerly II, Esq.

David L. Meyer

Michael D. Bergman

COVINGTON & BURLING

1201 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

(202) 662-5296

Counsel for the Direct Marketing  
Association, Inc.

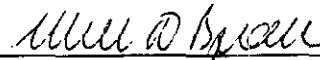
February 9, 1998

**Witness Sellick (UPS-T-2)**

DMA/UPS-T2-6. Please refer to your response to DMA/UPS-T2-1(a) where you state that "[t]he importance of assumptions which underlie an analysis depends on the impact a change in the assumptions would have on the final results." Have you performed any quantitative or statistical analysis concerning the impact that a change in any one of witness Degen's assumptions (referenced in DMA/UPS-T2-1) would have on the "final results" of Mr. Degen's mail processing cost distributions? If so, please summarize the results your analysis and provide a copy of any report detailing your analysis.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with Rule 12 of the Commission's Rules of Practice, as modified by the Special Rules of Practice.



---

Michael D. Bergman

February 9, 1998  
Washington, D.C.